

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

ERIC CERVINI, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	Civil Action
v.	§	
	§	No. 1:21-CV-565-RP
ELIAZAR CISNEROS, <i>et al.</i> ,	§	
	§	
Defendants.	§	

DOLORES PARK’S OBJECTIONS TO PLAINTIFFS’ EXHIBIT LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(B), Western District of Texas Local Rule 16, Defendant Dolores Park respectfully herein submits her objections to Plaintiffs’ proposed Exhibit List for trial (ECF 424 at Ex. D). Objections begin on the following page:

EXHIBIT No.	EXPECT To/MAY USE	DESCRIPTION	BEG BATES	Dolores Park's Objection
PTX-001	Expect To Use	W. Davis Video Footage dated Oct. 30, 2020	PLExpert00000819	FRE 106- incomplete and out of context, no objection upon all of W. Davis's videos being admitted in order of time sequence and in context- otherwise too misleading and prejudicial under FRE 403
PTX-002	Expect To Use	W. Davis Video Footage dated Oct. 30, 2020	PLExpert00000353	FRE 106- incomplete and out of context, no objection upon all of W. Davis's videos being admitted in order of time sequence and in context- otherwise too misleading and prejudicial under FRE 403
PTX-003	Expect To Use	W. Davis Video Footage dated Oct. 30, 2020	PLExpert00000352	FRE 106- incomplete and out of context, no objection upon all of W. Davis's videos being admitted in order of time sequence and in context- otherwise too misleading and prejudicial under FRE 403
PTX-004	Expect To Use	W. Davis Video Footage dated Oct. 30, 2020	PLExpert00000354	FRE 106- incomplete and out of context, no objection upon all of W. Davis's videos being admitted in order of time sequence and in context- otherwise too misleading and prejudicial under FRE 403
PTX-005	Expect To Use	W. Davis Medical Records	Plaintiffs000003099	FRE 106- Plaintiffs have not provided a complete record of W. Davis' Medical Records or Medical History, documents contains redactions not supported by the federal rules, Fed. R. C. P. 37- Plaintiffs failed to provide complete medical records during discovery, FRE 801, 802 document contains inadmissible hearsay, statements of a party or witness concerning medical conditions or treatment requires testimony to which witness or party is incompetent to testify FRE 601. Lacks authentication FRE 901

PTX-006	Expect To Use	Screen recording of X Post (formerly Twitter) dated Oct. 30, 2020	PLExpert00000389	Video contains inadmissible hearsay. FRE 801, 802. FRE 106- incomplete and out of context, misleading. Lacks authentication FRE 901. FRE 403- unfairly prejudicial and misleading.
PTX-007	Expect To Use	Screen recording of X Post (formerly Twitter) dated Nov. 2, 2020	PLExpert00000386	FRE 403- prejudicial as Defendant Dolores Park has no agreement, nor has she ever communicated with “Naomi” or “Jeff”. Unfairly prejudicial and misleading. Video contains inadmissible hearsay, FRE 801, 802. FRE 106- incomplete and out of context, misleading. Lacks authentication FRE 901.
PTX-008	Expect To Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000395	Video contains inadmissible hearsay, FRE 801, 802. FRE 106- incomplete and out of context, misleading, unfairly prejudicial. FRE 403. Lacks authentication FRE 901.
PTX-009	Expect To Use	H. Ceh Video Footage dated Oct. 30, 2020	PLExpert00000350	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with individuals in video/taking video.
PTX-010	Expect To Use	H. Ceh Video Footage dated Oct. 30, 2020	PLExpert00000347	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with individuals in video/taking video. FRE 901, lacks authentication.
PTX-011	Expect To Use	Video Footage from I-35 dated Oct.30, 2020	PLExpert00000345	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with individuals in video/taking video. FRE 901, lacks authentication. FRE 106- incomplete and out of context.
PTX-012	Expect To Use	Video Footage from I-35 dated Oct.30, 2020	PLExpert00000346	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with individuals in video/taking video. FRE 901, lacks

				authentication. FRE 106- incomplete and out of context.
PTX-013	Expect To Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000811	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with individuals in video/taking video. FRE 901, lacks authentication. FRE 106- incomplete and out of context.
PTX-014	Expect To Use	H. Ceh Video Footage dated Oct. 30, 2020	NONPARTY_00017859	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with individuals in video/taking video. FRE 901, lacks authentication. FRE 106- incomplete and out of context. Also, appears 100% duplicative to PTX-009.
PTX-015	Expect To Use	Battle for the Soul of Our Nation Bus Tour Flyer	Plaintiffs000000178	Flyer contains inadmissible hearsay, FRE 801, 802. Unreliable and irrelevant, FRE 401. Misleading, unfairly prejudicial. FRE 403. FRE 106- incomplete and out of context. FRE 901, lacks authentication.
PTX-016	Expect To Use	San Marcos Police Department ("SMPD") 911 Call Recording dated Oct. 30, 2020	NONPARTY_00028405	Recording contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Recording contains inadmissible opinion/conclusion to which witness or party is incompetent to testify FRE 601. Lacks authentication FRE 901. FRE 106- incomplete and out of context.
PTX-017	Expect To Use	Kyle Police Department ("KPD") 911 Call Recording dated Oct. 30, 2020	NONPARTY_00000122	Recording contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Recording contains inadmissible opinion/conclusion to which witness or party is incompetent to testify FRE 601. Lacks authentication FRE 901. FRE 106- incomplete and out of context.
PTX-018	Expect To Use	D. Gins Emails dated Oct. 29, 2020- Nov. 2, 2020	Plaintiffs000000139	FRE 106- incomplete and out of context. Contains inadmissible hearsay, FRE 801, 802. Lacks authentication FRE 901.
PTX-019	Expect To Use	D. Gins Signal Messages dated Oct. 30, 2020	Plaintiffs000000903; Plaintiffs000000899; Plaintiffs000000928;	FRE 106- incomplete and out of context. Contains inadmissible hearsay, FRE 801, 802. Lacks authentication FRE 901.

			Plaintiffs00000915; Plaintiffs00000929; Plaintiffs00000931; Plaintiffs00000916; Plaintiffs00000941; Plaintiffs00000946; Plaintiffs00000932; Plaintiffs00000956; Plaintiffs00000963; Plaintiffs00000949; Plaintiffs00000968; Plaintiffs00000981; Plaintiffs00000998; Plaintiffs00000986; Plaintiffs00000997; Plaintiffs00000996; Plaintiffs00000999; Plaintiffs00001010; Plaintiffs00001013	Misleading, unfairly prejudicial. FRE 403. Witness or party lacks competency or knowledge to render statement or conclusion, FRE 601.
PTX-020	Expect To Use	D. Gins Text Messages dated Jan. 19, 2021	Plaintiffs00002529	FRE 106- incomplete and out of context. Contains inadmissible hearsay, FRE 801, 802. Lacks authentication FRE 901. Misleading, unfairly prejudicial. FRE 403. Witness or party lacks competency or knowledge to render statement or conclusion, FRE 601.
PTX-021	Expect To Use	SMPD 911 Call Recording dated Oct. 30, 2020	NONPARTY_00028404	Contains inadmissible hearsay, FRE 801, 802. Lacks authentication FRE 901. Misleading, unfairly prejudicial. FRE 403. Witness or party lacks competency or knowledge to render statement or conclusion, FRE 601. Irrelevant to the actions of Dolores Park, FRE 401. FRE 106- incomplete and out of context.
PTX-022	Expect To Use	SMPD 911 Call Recording dated Oct. 30, 2020	NONPARTY_00028403	Contains inadmissible hearsay, FRE 801, 802. Lacks authentication FRE 901. Misleading, unfairly prejudicial. FRE 403. Witness or party lacks competency or knowledge to render statement or conclusion, FRE 601. Irrelevant to the actions of Dolores Park, FRE 401. FRE 106- incomplete and out of context.
PTX-023	Expect To Use	SMPD 911 Call Recording dated Oct. 30, 2020	NONPARTY_00028406	Contains inadmissible hearsay, FRE 801, 802. Lacks authentication FRE 901. Misleading, unfairly prejudicial. FRE 403. Witness or party lacks competency or knowledge to render statement or conclusion, FRE 601. Irrelevant to the

				actions of Dolores Park, FRE 401. FRE 106- incomplete and out of context.
PTX-024	Expect To Use	New Braunfels Police Department ("NBPD") 911 Call Recording dated Oct. 30, 2020	NONPARTY_00001750	Contains inadmissible hearsay, FRE 801, 802. Lacks authentication FRE 901. Misleading, unfairly prejudicial. FRE 403. Witness or party lacks competency or knowledge to render statement or conclusion, FRE 601. Irrelevant to the actions of Dolores Park, FRE 401. FRE 106- incomplete and out of context.
PTX-025	Expect To Use	D. Gins Medical Records	Plaintiffs00003122	FRE 106- Plaintiffs have not provided a complete record of D. Gins' Medical Records or Medical History; Fed. R. Civ. P. 37- Plaintiffs failed to provide complete medical records during discovery, FRE 801, 802 document contains inadmissible hearsay, statements of a party or witness concerning medical conditions or treatment requires testimony to which witness or party is incompetent to testify FRE 601. Lacks authentication FRE 901.
PTX-026	Expect To Use	Screen recording of X Post (formerly Twitter) dated Oct. 31, 2020	PLExpert00000375	Video contains inadmissible hearsay, FRE 801, 802. FRE 106- incomplete and out of context, misleading, unfairly prejudicial. FRE 403. Lacks authentication FRE 901. Video appears 100% duplicative of PTX-008.
PTX-027	Expect To Use	Text Messages Between J. Mesaros and E. Cisneros dated Nov. 1, 2021	Mesaros 1688 – 1702	Text messages are inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Lacks authentication FRE 901.
PTX-028	Expect To Use	E. Cisneros Text Messages dated Dec. 27, 2020	N/A	Text messages are inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Lacks authentication FRE 901.
PTX-029	Expect To Use	E. Cisneros Facebook Post dated Aug. 21, 2019	PLExpert00000376	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to

				Defendant Dolores Park, FRE 401. Lacks authentication FRE 901.
PTX-030	Expect To Use	Screen recording of X Post (formerly Twitter) dated June 3, 2020	PLExpert00000457	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901.
PTX-031	Expect To Use	Screen recording of X Post (formerly Twitter) dated Nov. 1, 2020	Plaintiffs00003652	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication 901.
PTX-032	Expect To Use	Alamo City Trump Train (“ACTT”) Podcast dated Mar. 31, 2022	PLExpert00000402	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901.
PTX-033	Expect To Use	E. Cisneros Email dated Mar. 3, 2022	PLExpert00000351	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901.
PTX-034	Expect To Use	E. Cisneros Facebook Post dated Oct. 30, 2020	PLExpert00000381	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901.
PTX-035	Expect To Use	E. Cisneros Facebook Message dated Nov. 2, 2020	PLExpert00000382	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901.
PTX-036	Expect To Use	Facebook Post dated Oct. 30, 2020	PLExpert00000362	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901.
PTX-037	Expect To Use	Screen recording of X Post (formerly	PLExpert00000400	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802.

		Twitter) dated Oct. 30, 2020		Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901.
PTX-038	Expect To Use	Screen recording of X Post (formerly Twitter) dated Oct. 30, 2020	PLExpert00000368	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901.
PTX-039	Expect To Use	Screenrecording of X Post (formerly Twitter) dated Oct. 31, 2020	PLExpert00000370	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. Contains statements to which witness or party is incompetent to testify FRE 601.
PTX-040	Expect To Use	E. Cisneros Facebook Post dated Oct. 31, 2020	Plaintiffs00000057	Misleading, unfairly prejudicial as to Defendant Dolores Park. FRE 403. Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. Contains statements to which witness or party is incompetent to testify FRE 601.
PTX-041	Expect To Use	H. Ceh Video Footage dated Oct. 30, 2020	NONPARTY_00017847	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. Contains statements to which witness or party is incompetent to testify FRE 601. FRE 106, incomplete and misleading.
PTX-042	Expect To Use	H. Ceh Video Footage dated Oct. 30, 2020	NONPARTY_00017799	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. Contains statements to which witness or party is incompetent to testify FRE 601. FRE 106, incomplete and misleading.
PTX-043	Expect To Use	H. Ceh Video Footage dated Oct. 30, 2020	NONPARTY_00017823	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. Contains statements to which witness or party is incompetent to testify FRE 601. FRE 106, incomplete and misleading.

PTX-044	Expect To Use	R. Ceh Social Media Post dated Oct. 31, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. Contains statements to which witness or party is incompetent to testify FRE 601. FRE 106, incomplete and misleading.
PTX-045	Expect To Use	Facebook Post dated Sept. 25, 2020	PLExpert00000119	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-046	Expect To Use	"Trump Train NB" Facebook Page	NONPARTY_ALLISON00016671	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-047	Expect To Use	Text Message Between Trump Train Leadership dated Oct. 30, 2020	PLExpert00000306 – 0344; PLExpert00000813 – 818	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-048	Expect To Use	R. Ceh Facebook Post dated Oct. 30, 2020	PLExpert00000211	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-049	Expect To Use	R. Ceh Facebook Post dated Oct. 30, 2020	PLExpert00000444	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-050	Expect To Use	Text Message Between Members of Ceh Family dated Oct. 30, 2020	PLExpert00000307 – 0317	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-051	Expect To Use	R. Ceh Facebook Post dated Oct. 30, 2020	NONPARTY_ALLISON00018132	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-052	Expect To Use	Screen recording of R. Ceh X Post (formerly Twitter) dated Oct. 30, 2020	PLExpert00000390	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.

PTX-053	Expect To Use	R. Ceh Facebook Post dated Oct. 30, 2020	NONPARTY_ALLI SON00018160	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-054	Expect To Use	R. Ceh Facebook Post dated Oct. 31, 2020	NONPARTY_ALLI SON00018856	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-055	Expect To Use	R. Ceh Facebook Post dated Oct. 31, 2020	NONPARTY_ALLI SON00018229	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-056	Expect To Use	R. Ceh Facebook Comment dated Oct. 26, 2020	PLExpert00000230	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-057	Expect To Use	R. Ceh Facebook Post dated Sept. 25, 2020	PLExpert00000119	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-058	Expect To Use	Text Message Between Members of Ceh Family dated Oct. 30, 2020	NONPARTY_00017 805	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-059	Expect To Use	S. Ceh Video Footage dated Oct. 30, 2020	NONPARTY_00017 813	Video contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-060	Expect To Use	New Braunfels Trump Train ("NBTT") MeWe Page	PLExpert00000252	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-061	Expect To Use	J. Mesaros Video Footage dated Nov. 5, 2020	PLExpert00000408	Video contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.

PTX-062	Expect To Use	D. Park Facebook Post dated Oct. 30, 2020	PLExpert00000420	FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35.
PTX-063	Expect To Use	D. Park Facebook Post dated Nov. 7, 2020	PLExpert00000421	FRE 106, incomplete and misleading. Cuts off photograph that is critical to understanding exhibit. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35. Contains inadmissible hearsay, FRE 801 and 802.
PTX-064	Expect To Use	D. Park Facebook Comment dated Nov. 4, 2020	N/A	FRE 106, incomplete and misleading. Cuts off photograph that is critical to understanding exhibit. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35. Contains inadmissible hearsay, FRE 801 and 802. FRE 901, not authenticated- no date and no record of this Facebook posting. Duplicative of PTX-220, except PTX-220 contains more complete graphic.
PTX-065	Expect To Use	D. Park Video Footage posted Oct. 19, 2020	N/A	FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35 on October 30, 2020.
PTX-066	Expect To Use	D. Park Facebook Post dated Oct. 29, 2020	N/A	FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35 on October 30, 2020.

PTX-067	Expect To Use	D. Park Instagram Post dated Oct. 29, 2020	PLExpert00000423	FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35 on October 30, 2020.
PTX-068	Expect To Use	D. Park Instagram Post dated Oct. 29, 2020	N/A	FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35 on October 30, 2020.
PTX-069	Expect To Use	D. Park Facebook Comment dated Oct. 29, 2020	PLExpert00000459	FRE 901, not authenticated. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to caravan on I-35 on October 30, 2020.
PTX-070	Expect To Use	D. Park Video Footage dated Oct. 30, 2020	PLExpert00000413	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-071	Expect To Use	D. Park Instagram Post dated Oct. 30, 2020	N/A	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901, photograph not authenticated.
PTX-072	Expect To Use	D. Park Video Footage dated Oct. 30, 2020	PLExpert00000417	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-073	Expect To Use	D. Park Video Footage dated Oct. 30, 2020	PLExpert00000407	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-074	Expect To Use	D. Park Video Footage dated Oct. 30, 2020	PLExpert00000414	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-075	Expect To Use	Dolores Park Facebook Post dated Nov. 3, 2020	PLExpert00000358	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE- 602, lack of personal knowledge. Post includes inadmissible hearsay, FRE 801, 802.
PTX-076	Expect To Use	D. Park Facebook Post dated Oct. 31, 2020	PLExpert00000422	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Post includes inadmissible hearsay, FRE 801, 802.
PTX-077	Expect To Use	D. Park Video Footage dated Oct. 30, 2020	PLExpert00000416	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative

				evidence. Video is 100% duplicative of PTX-072.
PTX-078	Expect To Use	D. Park Facebook Post dated Oct. 31, 2020	N/A	FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Post includes inadmissible hearsay, FRE 801, 802.
PTX-079	Expect To Use	D. Park Social Media Post dated Nov. 3, 2020	N/A	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE- 602, lack of personal knowledge. FRE 901- not authenticated. Post includes inadmissible hearsay, FRE 801, 802. Duplicative of PTX-075.
PTX-080	Expect To Use	Video Footage from D. Olinick Facebook Page dated Oct. 28, 2020	Plaintiffs00007124	Post from third party, not authenticated. FRE 901. FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE- 602, lack of personal knowledge. Post includes inadmissible hearsay, FRE 801, 802.
PTX-081	Expect To Use	D. Park Instagram Post dated Oct. 30, 2020	N/A	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Post includes inadmissible hearsay, FRE 801, 802. Comment appears duplicative of PTX-071.
PTX-082	Expect To Use	D. Park Facebook Post dated Oct. 31, 2020	N/A	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence. Post includes inadmissible hearsay, FRE 801, 802.
PTX-083	Expect To Use	R. Mesaros Facebook Comment dated Sept. 12, 2021	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-084	Expect To Use	J. Mesaros Video Footage dated Oct. 30, 2020	N/A	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with individuals in video/taking video. FRE 901, lacks authentication. FRE 106- incomplete and out of context. Duplicative of PTX-012.
PTX-085	Expect To Use	R. Ceh Facebook Post dated Oct. 30, 2020	PLExpert00000436	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-086	Expect To Use	R. Mesaros Facebook Post dated Oct. 31, 2020	NONPARTY_ALLI SON00014112	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-087	Expect To Use	R. Mesaros Facebook Comment dated Feb. 19, 2021	PLExpert00000411	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-088	Expect To Use	Text Messages between J. Mesaros and R. Mesaros dated Nov. 19, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-089	Expect To Use	R. Mesaros Facebook Comment Takeout	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-090	Expect To Use	R. Mesaros Facebook Status Takeout	PLExpert00000410	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.

PTX-091	Expect To Use	Photograph of Biden-Harris Campaign Bus From Oct. 30, 2020	N/A	FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901, not authenticated. FRE 401, not relevant to Dolores Park.
PTX-092	Expect To Use	Photograph of Biden-Harris Campaign Bus From Oct. 30, 2020	N/A	FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901, not authenticated. FRE 401, not relevant to Dolores Park.
PTX-093	Expect To Use	Photograph of Biden-Harris Campaign Bus From Oct. 30, 2020	N/A	FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901, not authenticated. FRE 401, not relevant to Dolores Park.
PTX-094	Expect To Use	R. Mesaros Facebook Post dated Oct. 31, 2020	PLExpert00000455	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-095	Expect To Use	J. Mesaros Facebook Message Takeout	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-096	Expect To Use	J. Mesaros Facebook Comments dated Jan. 1, 2020	PLExpert00000461	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-097	Expect To Use	J. Mesaros Facebook Comments dated Oct. 1, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-098	Expect To Use	Text Messages between J. Mesaros and R. Mesaros dated Nov. 19, 2020	Mesaros 1879-2081	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.

PTX-099	Expect To Use	Text Messages between J. Mesaros and R. Ceh dated Sept. 24, 2022	Mesaros 1707	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-100	Expect To Use	R. Ceh Facebook Post dated Oct. 30, 2020	PLExpert00000211	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-101	Expect To Use	Video Footage from I-35 dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading. FRE 610, improper evidence of religious beliefs or opinions to attack credibility.
PTX-102	Expect To Use	J. Mesaros Video Footage dated Oct. 30, 2020	N/A	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with individuals in video/taking video. FRE 901, lacks authentication. FRE 106- incomplete and out of context. Duplicative of PTX-012 and PTX-084.
PTX-103	Expect To Use	J. Mesaros Video Footage dated Oct. 30, 2020	N/A	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with individuals in video/taking video. FRE 901, lacks authentication. FRE 106- incomplete and out of context.
PTX-104	Expect To Use	J. Mesaros Facebook Post dated Oct. 30, 2020	PLExpert00000372	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-105	Expect To Use	J. Mesaros Facebook Post dated Oct. 30, 2020	NONPARTY_ALLISON00018319	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-106	Expect To Use	J. Mesaros Video Footage dated Nov. 5, 2020	PLExpert00000408	Video contains inadmissible hearsay, FRE 801, 802. misleading, unfairly prejudicial. FRE 403. Dolores Park has

				no agreement, nor has she ever communicated with individuals in video/taking video. FRE 901, lacks authentication. FRE 106- incomplete and out of context. Duplicative of PTX-061.
PTX-107	Expect To Use	Screenshot of FreeSpeechDefender.com	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-108	Expect To Use	Free Speech Defender Fundraising Page July 17, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-109	May Use	Subpoena to S. Ceh dated Jan. 13, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with S. Ceh. She never entered into a conspiracy with him or any other defendant. FRE 901, lacks authentication. FRE 106- incomplete and out of context.
PTX-110	May Use	Plaintiffs' First Set of Requests for Production of Documents to S. Ceh	N/A	Contains inadmissible hearsay, FRE 801, 802. Misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with S. Ceh. She never entered into a conspiracy with him or any other defendant. FRE 901, lacks authentication. FRE 106- incomplete and out of context.
PTX-111	May Use	Plaintiffs' Second Set of Requests for Production of Documents to S. Ceh	N/A	Contains inadmissible hearsay, FRE 801, 802. Misleading, unfairly prejudicial. FRE 403. Dolores Park has no agreement, nor has she ever communicated with S. Ceh. She never entered into a conspiracy with him or any other defendant. FRE 901, lacks authentication. FRE 106- incomplete and out of context.
PTX-112	May Use	NBTT MeWe Page	NONPARTY_ALLI SON00041077	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.

PTX-113	May Use	S. Ceh Discord Chat	NONPARTY_ALLI SON00015950	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-114	May Use	News Article dated Oct. 31, 2020	Plaintiffs00003653	Inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge.
PTX-115	May Use	Text Message Between Members of Ceh Family dated Aug. 10, 2020	NONPARTY_0001 5991	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-116	May Use	R. Ceh Facebook Post dated Sept. 4, 2020	NONPARTY_ALLI SON00001418	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park or events on October 30, 2020 on I-35, FRE 401. Lacks authentication FRE 901. FRE 106, incomplete and misleading.
PTX-117	May Use	S. Ceh's Responses to Plaintiffs' First Set of Discovery Requests	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge.
PTX-118	May Use	Screen recording of X Post (formerly Twitter) dated Oct. 31, 2020	PLExpert00000371	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge.
PTX-119	May Use	Screen recording of YouTube Video dated Nov. 1, 2020	PLExpert00000380	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge.
PTX-120	May Use	Screen recording of X Post (formerly Twitter) dated Oct. 30, 2020	PLExpert00000365	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated.
PTX-121	May Use	Screen recording of X Post (formerly Twitter) dated Oct. 31, 2020	PLExpert00000373	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE

				602- lack of personal knowledge. FRE 901- not authenticated.
PTX-122	May Use	Screen recording of J. Mesaros Facebook Post dated Oct. 31, 2020	PLExpert00000360	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated.
PTX-123	May Use	Screen recording of J. Mesaros Facebook Comment	PLExpert00000388	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated.
PTX-124	May Use	Screen recording of D. Park Instagram Post dated Oct. 30, 2020	PLExpert00000378	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative of PTX-072.
PTX-125	May Use	Screen recording of D. Park Instagram Post dated Oct. 30, 2020	PLExpert00000367	FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative of PTX-072. Contains inadmissible hearsay, FRE 801, 801. Comment is duplicative of PTX-071 and PTX-081.
PTX-126	May Use	Screenrecording of X Post (formerly Twitter) dated Oct. 31, 2020	PLExpert00000383	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-127	May Use	Screenrecording of X Post (formerly Twitter) dated Nov. 2, 2020	PLExpert00000363	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE

				602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-128	May Use	Screen recording of X Post (formerly Twitter) dated Nov. 2, 2020	PLExpert00000387	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-129	May Use	Screen recording of X Post (formerly Twitter) dated Nov. 2, 2020	PLExpert00000369	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-130	May Use	Screen recording of X Post (formerly Twitter) dated Nov. 2, 2020	PLExpert00000366	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-131	May Use	Screen recording of YouTube Video dated Oct. 31, 2020	PLExpert00000391	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-132	May Use	Instagram Video dated Oct. 29, 2020	PLExpert00000405	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-133	May Use	Screen recording of X Post (formerly Twitter) dated Oct. 31, 2020	PLExpert00000393	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901, not authenticated.
PTX-134	May Use	Screen recording of X Post (formerly Twitter) dated Oct. 31, 2020	PLExpert00000394	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901, not authenticated.
PTX-135	May Use	D. Gins Video Footage of AFL-CIO Austin dated Oct. 30, 2020	PLExpert00000356	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-136	May Use	Screen recording of X Post (formerly	PLExpert00000823	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to

		Twitter) dated Oct. 30, 2021		Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901, not authenticated. Duplicative of PTX-118.
PTX-137	May Use	Screen recording of X Post (formerly Twitter) dated Nov. 1, 2020	PLExpert00000401	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative of PTX-038.
PTX-138	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000406	Contains inadmissible hearsay, FRE 801, 802. Lacks any relevance as it pertains to Defendant Dolores Park, FRE 401. Lacks authentication FRE 901. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. FRE 610, improper evidence of religious beliefs or opinions to attack credibility. Duplicative of PTX-101.
PTX-139	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000348	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative.
PTX-140	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000349	Lacks relevance as it pertains to Defendant Dolores Park, FRE 401.

PTX-141	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000809	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative.
PTX-142	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000415	Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. In slow motion. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-143	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000418	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative.
PTX-144	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000821	No objection.
PTX-145	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000820	No objection.
PTX-146	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000822	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the

				issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-147	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000812	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative.
PTX-148	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000808	Lacks relevance as it pertains to Defendant Dolores Park, FRE 401.
PTX-149	May Use	Video Footage from I-35 dated Oct. 30, 2020	PLExpert00000810	Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative.
PTX-150	May Use	J. Mesaros Tik Tok Post dated Jan. 26, 2020	Plaintiffs00007086	Lacks relevance as it pertains to Defendant Dolores Park, FRE 401.
PTX-151	May Use	D. Gins Emails dated Oct. 29-30, 2020	Plaintiffs00001460– Plaintiffs00001465	No objection to Bates numbers 1460-1465, other than Plaintiffs need to provide complete record per FRE 106.
PTX-152	May Use	D. Gins Voter Registration	Plaintiffs00003610	FRE 901, lacks authentication. FRE 602- no witness on witness list can lay foundation for admissibility and veracity.
PTX-153	May Use	D. Gins Text Messages dated Oct. 30, 2020	Plaintiffs00002537; Plaintiffs00002534; Plaintiffs00002531	602- D. Gins was not driving and lacks knowledge to arrive at conclusions in the text messages. Statements not supported by other evidence and video. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. Contains inadmissible

				hearsay, FRE 801, 802 when offered by Plaintiffs.
PTX-154	May Use	D. Gins Text Messages dated Oct. 30, 2020	Plaintiffs00002540; Plaintiffs00002533; Plaintiffs00002532	602- D. Gins was not driving and lacks knowledge to arrive at conclusions in the text messages. Statements not supported by other evidence and video. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. Contains inadmissible hearsay, FRE 801, 802 when offered by Plaintiffs.
PTX-155	May Use	D. Gins Text Messages dated Oct. 30, 2020	Plaintiffs00002535– Plaintiffs00002536	602- D. Gins was not driving and lacks knowledge to arrive at conclusions in the text messages. Statements not supported by other evidence and video. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. Contains inadmissible hearsay, FRE 801, 802 when offered by Plaintiffs.
PTX-156	May Use	E. Cisneros Deposition Transcript	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-157	May Use	E. Cisneros Video Deposition	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-158	May Use	E. Cisneros Emails dated Oct. 20, 2020	Plaintiffs00002535– Plaintiffs00002536	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-159	May Use	News Article dated Sept. 17, 2020	Plaintiffs00006468	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-160	May Use	E. Niño Facebook Post dated Oct. 30, 2020	PLExpert00000412	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 901- not authenticated. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-161	May Use	E. Cisneros Text Messages dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE

				403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-162	May Use	E. Cisneros' Initial Disclosures	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-163	May Use	Plaintiffs' Second Set of Requests for Production of Documents to E. Cisneros	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-164	May Use	Transcript of Hearing before Hon. Judge Mark Lane dated Jan. 31, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros or J. Mesaros and their statements should not be used against her. Depending on presentation of transcript, admission could violate FRE 106, which requires a complete record and for evidence to be admitted in a manner that does not mislead the jury. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. <i>E.g.</i> , Line of questioning with E. Cisneros regarding gun ownership, Jan. 6 th, etc. has little or no relevance to Dolores Park or her actions or

				culpability. The relevance of such testimony is far outweighed by the danger of unfair prejudice, confusion of the issues, misleading the jury.
PTX-165	May Use	Part 1 of Audio of Hearing before Hon. Judge Mark Lane dated Jan. 31, 2024	N/A	Same objection as PTX-164.
PTX-166	May Use	Part 2 of Audio of Hearing before Hon. Judge Mark Lane dated Jan. 31, 2024	N/A	Same objection as PTX-164.
PTX-167	May Use	Part 3 of Audio of Hearing before Hon. Judge Mark Lane dated Jan. 31, 2024	N/A	Same objection as PTX-164.
PTX-168	May Use	Part 4 of Audio of Hearing before Hon. Judge Mark Lane dated Jan. 31, 2024	N/A	Same objection as PTX-164.
PTX-169	May Use	Transcript of Hearing before Hon. Judge Mark Lane dated Oct. 27, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-170	May Use	Audio of Hearing before Hon. Judge Mark Lane dated Oct. 27, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury,

				wasting time, needlessly presenting cumulative evidence.
PTX-171	May Use	E. Cisneros Affidavit dated Oct. 25, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-172	May Use	Email dated July 7, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. Further this is an email from Counsel J. Suriani who is not a witness in the case, but Plaintiffs' Counsel.
PTX-173	May Use	E. Cisneros' Responses to Plaintiffs' First Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-174	May Use	E. Cisneros' Responses to Plaintiffs' First Set of Requests for Production of Documents	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury,

				wasting time, needlessly presenting cumulative evidence.
PTX-175	May Use	E. Cisneros' Responses to Plaintiffs' First Set of Requests for Admission	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-176	May Use	E. Cisneros' Responses to Plaintiffs' First Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative of PTX-173.
PTX-177	May Use	E. Cisneros' Responses to Plaintiffs' Third Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-178	May Use	E. Cisneros' Responses to Plaintiffs' Fourth Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it

				pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-179	May Use	Letter dated Apr. 14, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. This exhibit is a letter from E. Cisneros' legal counsel who is not a witness in the case but counsel.
PTX-180	May Use	Plaintiffs' Third Set of Requests for Production of E. Cisneros	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-181	May Use	E. Cisneros Affidavit dated September 22, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance

				substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Additionally, the bulk of PTX-181 as provided by counsel is inadmissible legal argument.
PTX-182	May Use	Contact Information for E. Nino	N/A	No objection.
PTX-183	May Use	E. Nino Text Messages dated Nov. 6, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-184	May Use	Text Messages between E. Cisneros and J. Pena dated Dec. 12, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros or J. Pena or a person named Keith referenced in the texts and their statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-185	May Use	Video Footage from I-35 dated Oct. 30, 2020	N/A	Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 901- lacks authentication, it is not apparent from video who took it or if it is a fair and accurate representation.
PTX-186	May Use	Video Footage from I-35 dated Oct. 30, 2020	N/A	Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. Shows bus exiting I-35 at Exit 233, Dolores Park is not present in video. FRE 106, incomplete and misleading.

				FRE 901- lacks authentication, it is not apparent from video who took it or if it is a fair and accurate representation.
PTX-187	May Use	R. Ceh Deposition Transcript	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh and her statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-188	May Use	R. Ceh Video Deposition	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh and her statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-189	May Use	Plaintiffs' First Set of Request for Production of Documents to R. Ceh	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh and her statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-190	May Use	Plaintiffs' Second Set of Request for Production of Documents to R. Ceh	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE

				403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-191	May Use	News Article dated Sept. 4, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. New article with hearsay statements. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-192	May Use	R. Ceh Facebook Post dated Sept. 23, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with Steve Ceh or Randi Ceh or any of the individuals who commented on facebook and these statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-193	May Use	Text Messages between Members of the Ceh Family Sept. 4, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with Steve Ceh or Randi Ceh or any members on the text string and these statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

PTX-194	May Use	Text Messages between Members of the Ceh Family Nov. 14, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with Steve Ceh or Randi Ceh or any members on the text string and these statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-195	May Use	Text Messages between Members of the Ceh Family Nov. 14, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with Steve Ceh or Randi Ceh or any members on the text string and these statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-196	May Use	Text Messages between Members of the Ceh Family Nov. 21, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with Steve Ceh or Randi Ceh or any members on the text string and these statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-197	May Use	Plaintiffs' First Set of Requests for Admission to R. Ceh	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a

				conspiracy with R. Ceh and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-198	May Use	R. Ceh's Responses to Plaintiffs' First Set of Requests for Admission to R. Ceh	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-199	May Use	R. Ceh Text Messages dated Apr. 3, 2022	NONPARTY_00024918	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh or Hannah Ceh, or anyone and these statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-200	May Use	Facebook Post dated Sept. 2, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with Hannah Ceh, or anyone and these statements made on Facebook that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal

				knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-201	May Use	Facebook Post dated Sept. 4, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh, S. Ceh, or anyone and these statements made on Facebook that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-202	May Use	R. Ceh Facebook Post dated Oct. 17, 2020	NONPARTY_ALLI SON00006040	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh, S. Ceh, C. Ceh, or anyone and these statements made on Facebook that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence
PTX-203	May Use	Facebook Post dated Nov. 3, 2020	NONPARTY_ALLI SON0000618306	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh, S. Ceh, or anyone and these statements made on Facebook that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance

				substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence
PTX-204	May Use	Facebook Post dated Nov. 4, 2020	NONPARTY_ALLI SON00017920	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy S. Ceh, or anyone and these statements made on Facebook that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence
PTX-205	May Use	R. Ceh Discord Post dated Nov. 8, 2020	NONPARTY_ALLI SON00015814	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy R. Ceh, or anyone and these statements made on Discord that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence
PTX-206	May Use	H. Ceh Video Footage dated Oct. 30, 2020	NONPARTY_0001 7853	Video is irrelevant as it pertains to Dolores Park. She does not know the people in the video, nor does she condone any of their actions, nor did she know about them. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence

PTX-207	May Use	S. Ceh Deposition	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with S. Ceh and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-208	May Use	S. Ceh Video of Deposition	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with S. Ceh and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-209	May Use	R. Ceh Facebook Post dated Sept. 4, 2020	NONPARTY_ALLI SON00012473	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy R. Ceh, or anyone and these statements made on Facebook that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative of PTX-201.
PTX-210	May Use	Facebook Post dated Sept. 4, 2020	NONPARTY_ALLI SON00007980	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy R. Ceh, S. Ceh, or anyone and these statements made on Facebook that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE

				602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-211	May Use	Facebook Post dated Sept. 9, 2020	PLExpert00000024	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy R. Ceh, S. Ceh, or anyone and these statements made on Facebook that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-212	May Use	Facebook Post dated Sept. 23, 2020	PLExpert00000104	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy R. Ceh, S. Ceh, or anyone and these statements made on Facebook that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative.
PTX-213	May Use	Text Messages between S. Ceh, C. Ceh, K. Kruger and Others dated Nov. 17, 2020	NONPARTY_00018388	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy R. Ceh, S. Ceh, K. Kruger, C. Ceh, or anyone and these text message statements that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the

				issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-214	May Use	Video Footage of S. Ceh	N/A	Dolores Park never entered into a conspiracy S. Ceh, or anyone and his statements should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 610, improper evidence of religious beliefs or opinions to attack credibility.
PTX-215	May Use	Facebook Post dated Oct. 30, 2020	PLExpert00000211	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these Facebook posts and comments should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative of PTX-251..
PTX-216	May Use	Facebook Post dated Oct. 30, 2020	PLExpert00000444	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh or anyone and these Facebook posts and comments should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-217	May Use	Text Messages between Members of Ceh Family dated Jan. 5, 2021	NONPARTY_00019010	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy R. Ceh, S. Ceh, K. Kruger, C. Ceh, or anyone and these text message statements that Dolores Park never saw and has no connection to should not be used against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 602- lack of personal knowledge. FRE 403,

				relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-218	May Use	D. Park Deposition Transcript	N/A	Objections have been preserved by Dolores Park's counsel within the transcript. Contains inadmissible hearsay, FRE 801, 802. Statements lacking context might be inadmissible under FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Transcript discusses and attaches inadmissible evidence and hearsay documents and videos. FRE 801, 802.
PTX-219	May Use	D. Park Video of Deposition	N/A	Objections have been preserved by Dolores Park's counsel within the transcript. Contains inadmissible hearsay, FRE 801, 802. Statements lacking context might be inadmissible under FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Transcript discusses and contains inadmissible evidence and hearsay documents and videos. FRE 801, 802.
PTX-220	May Use	D. Park Facebook Post dated Nov. 7, 2020	N/A	Duplicative of PTX-064, except this exhibit contains full picture. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35. Contains inadmissible hearsay, FRE 801 and 802. FRE 901, not

				authenticated- no date and no record of this Facebook posting.
PTX-221	May Use	D. Park Instagram Post dated Oct. 24, 2020	N/A	FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35.
PTX-222	May Use	D. Park Video Footage dated Oct. 10, 2020	N/A	FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Video footage of Oct. 10, 2020, twenty days before alleged date of the incident.
PTX-223	May Use	D. Park Instagram Post dated Oct. 19, 2020	N/A	FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 401, irrelevant to events on I-35. Contains inadmissible hearsay, FRE 801 and 802. Duplicative of PTX-065.
PTX-224	May Use	L. Kirby Facebook Post dated Oct. 30, 2020	PLExpert00000460	FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. This is not evidence against Dolores Park. She did not comment on this post or support it. This Facebook Post is Contains inadmissible hearsay, FRE 801 and 802. Lacks relevance as if pertains to Dolores Park, FRE 401. FRE 106, incomplete and misleading.
PTX-225	May Use	D. Park Recording of News Segment	N/A	Video contains inadmissible hearsay of Plaintiffs' statements to the media and statements of Former-President Trump, President Biden, and newscasters, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-226	May Use	D. Park Facebook Post dated Oct. 31, 2020	Plaintiffs00003683	Contains inadmissible hearsay, FRE 801 and 802. Dolores Park does not adopt the comments of other individuals as her own. Dolores Park does not know the individuals who commented on her Facebook Page, nor did she know of these comments. FRE 901, facebook comments cannot be authenticated through witnesses on Plaintiffs' witness list. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Duplicative of PTX-136 and PTX-118.
PTX-227	May Use	D. Park Facebook Post dated Oct. 31, 2020	Plaintiffs00003684	Contains inadmissible hearsay, FRE 801 and 802. Dolores Park does not adopt the comments of other individuals as her own. Dolores Park does not know the individuals who commented on her Facebook Page, nor did she know of these comments. Dolores Park in no way condones or supports or knew about an individual by the name of Laura Manjarrez posting an incendiary meme of Ku Klux Klan members. Dolores Park abhors racism in every form. This exhibit violates FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Exhibit contains inappropriate redaction not supported by the Federal Rules of Evidence or the Federal Rules of Civil Procedure. FRE 901, facebook comments cannot be authenticated through witnesses on Plaintiffs' witness list.
PTX-228	May Use	D. Park's Amended Responses to Plaintiffs' First Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and

				misleading. Dolores Park also reasserted the objections stated in her amended response to Plaintiffs' first set of interrogatories.
PTX-229	May Use	D. Park Instagram Post dated Oct. 31, 2020	N/A	FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Not relevant to events of Oct. 30, 2020 on I-35.
PTX-230	May Use	L. Kirby Deposition Transcript	N/A	Hearsay, FRE 801 and 802. Exhibits also contain inadmissible and violate FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-231	May Use	M. Lerma Deposition Transcript	N/A	Hearsay, FRE 801 and 802. Exhibits also contain inadmissible and violate FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-232	May Use	D. Park Video Footage dated Oct. 30, 2020	N/A	FRE 106, incomplete and misleading.
PTX-233	May Use	D. Park's Responses to Plaintiffs' Second Set of Requests for Admission	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. Dolores Park also reasserts the objections stated in her response to Plaintiffs' second set of requests for admission.
PTX-234	May Use	D. Park's Responses to Plaintiffs' First Set of Requests for Production of Documents	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. Dolores Park also reasserts the objections stated in her responses to

				Plaintiffs' responses to Plaintiffs' first set of requests for production of documents and as the request relates to the exhibit contained on this exhibit list, reasserts the individual objections to the documents as they appear in Plaintiffs' exhibit list herein.
PTX-235	May Use	D. Park's Responses to Plaintiffs' First Set of Requests for Admission	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. Dolores Park also reasserts the objections stated in her responses to Plaintiffs' first set of requests for admission.
PTX-236	May Use	D. Park's Responses to Plaintiffs' Second Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. Dolores Park also reasserts the objections stated in her responses to Plaintiffs' second set of interrogatories.
PTX-237	May Use	D. Park's Responses to Plaintiffs' Third Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. Dolores Park also reasserts the objections stated in her responses to Plaintiffs' third set of interrogatories.
PTX-238	May Use	ACTT Facebook Group Membership List	N/A	No objection. Dolores Park was never a member of the Alamo City Trump Train.
PTX-239	May Use	D. Park Facebook Post dated Oct. 17, 2020	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative

				evidence. FRE 106, incomplete and misleading.
PTX-240	May Use	S. Hill Response to Subpoena	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. FRE 901, not authenticated.
PTX-241	May Use	E. Niño Facebook Post dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. FRE 901, not authenticated. FRE 401, not relevant to Dolores Park. She did not know of post, nor ever read it. Post is not liked by Dolores Park, nor does she comment on it.
PTX-242	May Use	E. Niño Facebook Post dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. FRE 901, not authenticated. FRE 401, not relevant to Dolores Park. She did not know of post, nor ever read it. Post is not liked by Dolores Park, nor does she comment on it.
PTX-243	May Use	R. Mesaros Deposition Transcript	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Mesaros and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-244	May Use	R. Mesaros Video of Deposition	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a

				conspiracy with R. Mesaros and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-245	May Use	Facebook Messages between R. Ceh and R. Mesaros dated Nov. 2, 2020 to Dec. 12, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ce, or R. Mesaros, or anyone and this statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-246	May Use	C. Ceh Facebook Post dated Sept. 11, 2021	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with C. Ceh and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-247	May Use	Facebook Messages between C. Ceh and R. Mesaros dated Sept. 12, 2021	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Mesaros or C. Ceh or anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-248	May Use	Facebook Messages between C. Ceh and	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Mesaros or C. Ceh or

		R. Mesaros dated Sept. 12, 2021		anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-249	May Use	Facebook Post dated Nov. 3, 2020	PLExpert00000206	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-250	May Use	Screenrecording of X Post (formerly Twitter) dated Nov. 1, 2020	Plaintiffs00003652	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with E. Cisneros or anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. This video is incendiary and should not be put before the jury. Dolores Park knew nothing of the events in the video and had nothing to do with it, nor does she condone or support any actions taken by E. Cisneros in the video. Duplicative of PTX-31.
PTX-251	May Use	Facebook Post dated Oct. 30, 2020	PLExpert00000211	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with R. Ceh, S. Ceh, or anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence. Duplicative of PTX-215.
PTX-252	May Use	J. Mesaros Video Footage dated Oct. 30, 2020	N/A	FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. FRE 901, not authenticated. FRE 401, lacks relevance as to Dolores Park. No identification of where the video was taken, what time, etc.
PTX-253	May Use	R. Mesaros Video Footage dated Oct. 30, 2020	N/A	No objection.
PTX-254	May Use	J. Mesaros Video Footage dated Oct. 30, 2020	N/A	No objection.
PTX-255	May Use	W. Davis Video Footage dated Oct. 30, 2020	N/A	FRE 106, incomplete and misleading-camera zooms in and out and makes the truck in front of the bus appear closer than it is. FRE 801, 802, contains inadmissible hearsay.
PTX-256	May Use	J. Mesaros Facebook Post dated Oct. 30, 2020	PLExpert00000372	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with J. Mesaros, or anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-257	May Use	Facebook Post dated Oct. 31, 2020	NONPARTY_ALLISON00019116	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

PTX-258	May Use	C. Ceh Facebook Post dated Jan. 6, 2021	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-259	May Use	Plaintiffs' First Set of Requests for Production of Documents to R. Mesaros	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-260	May Use	Text Messages Between J. Mesaros and R. Mesaros dated Feb. 11, 2021	Mesaros 1879-2081	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-261	May Use	J. Mesaros Video Footage dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and this video should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. Dolores Park does not have knowledge nor understand what this video depicts. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-262	May Use	R. Mesaros Responses to Plaintiffs' First Set of Requests for Admission	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-263	May Use	R. Mesaros' Responses to Plaintiffs' Second Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-264	May Use	J. Mesaros' Responses to Plaintiffs' Second Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-265	May Use	J. Mesaros Deposition Transcript	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with J. Mesaros and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-266	May Use	J. Mesaros Video of Deposition	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with J. Mesaros and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-267	May Use	J. Mesaros Facebook Messages dated Oct. 28, 2020 to Nov. 20, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-268	May Use	Text Messages between J. Mesaros and S. Evans dated Sept. 27, 2021 to Nov. 8, 2022	Mesaros 1732	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-269	May Use	R. Ceh Facebook Post dated Oct. 30, 2020	PLExpert00000104	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-270	May Use	Facebook Post dated Oct. 30, 2020	PLExpert00000432	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-271	May Use	J. Mesaros Video Footage dated Oct. 25, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and this video should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. Dolores Park has no knowledge of what is going on in this specific video nor understand what the video depicts. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-272	May Use	Ari Hoffman Podcast	Plaintiffs000006582	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401.
PTX-273	May Use	W. Davis Video Footage dated Oct. 30, 2020	N/A	Duplicative of PTX-255.FRE 106, incomplete and misleading- camera zooms in and out and makes the truck in front of the bus appear closer than it is. FRE 801, 802, contains inadmissible hearsay.
PTX-274	May Use	Facebook Post dated Oct. 31, 2020	Plaintiffs000003673	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance

				substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-275	May Use	Facebook Post dated Oct. 31, 2020	NONPARTY_ALLI SON00019190	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-276	May Use	Free Speech Defenders Facebook Page	Plaintiffs00006870	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401
PTX-277	May Use	Michael Berry Interview	Plaintiffs00003763	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401
PTX-278	May Use	R. Mesaros Facebook Comments	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-279	May Use	Common Sense Show Podcast	Plaintiffs00006325	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as

				it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-280	May Use	Plaintiffs' First Set of Requests for Production of Documents to J. Mesaros	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-281	May Use	Crowe Report dated Nov. 3, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-282	May Use	J. Mesaros' Responses to Plaintiffs' First Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-283	May Use	J. Mesaros' Responses to Plaintiffs' First Set of Requests for Production of Documents	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park,

				FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-284	May Use	J. Mesaros' First Amended Responses to Plaintiffs' First Set of Requests for Production of Documents	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-285	May Use	J. Mesaros' Responses to Plaintiffs' Second Set of Requests for Production of Documents	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-286	May Use	J. Mesaros' Responses to Plaintiffs' First Set of Requests for Admission	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-287	May Use	J. Mesaros' Responses to Plaintiff's Third Set of Requests for Production & Inspection	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance

				substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-288	May Use	J. Mesaros' Responses to Third Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-289	May Use	Post to NB TT Facebook Page dated Nov. 4, 2020	PLExpert00000198	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-290	May Use	Post to NB TT Facebook Page dated Sept. 8, 2020	PLExpert00000163	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-291	May Use	R. Ceh Facebook Post dated Sept. 16, 2020	PLExpert00000135	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of

				unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-292	May Use	R. Ceh Facebook Post dated Sept. 16, 2020	PLExpert00000426	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-293	May Use	Facebook Post dated Aug. 30, 2020	PLExpert00000152	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-294	May Use	Facebook Post dated Sept. 25, 2020	PLExpert00000036	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-295	May Use	E. Cisneros X Post (formerly Twitter) dated June 12, 2020	PLExpert00000385	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues,

				misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-296	May Use	ACTT Facebook Calendar Invite dated Sept. 27, 2020	PLExpert00000364	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-297	May Use	SMPD Email dated Oct. 9, 2020	PLExpert00000790	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. This email pertains to an event on Oct. 10, 2020. It is of little relevance but highly prejudice with danger of confusing and misleading the jury.
PTX-298	May Use	Facebook Post dated Aug. 30, 2020	PLExpert00000098	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-299	May Use	Facebook Post dated Aug, 30, 2020	PLExpert00000424	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park,

				FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-300	May Use	Facebook Post dated Oct. 31, 2020	PLExpert00000180	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-301	May Use	Facebook Post dated Oct. 30, 2020	PLExpert00000075	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-302	May Use	R. Ceh Facebook Post dated Oct. 16, 2020	PLExpert00000046	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-303	May Use	Facebook Post dated Oct. 30, 2020	PLExpert00000248	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance

				substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-304	May Use	Facebook Post dated Oct. 9, 2020	PLExpert00000166	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-305	May Use	Facebook Post dated Oct. 13, 2020	PLExpert00000238	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-306	May Use	Facebook Post dated Oct. 13, 2020	PLExpert00000245	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-307	May Use	Facebook Post dated Sept. 30, 2020	PLExpert00000155	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of

				unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-308	May Use	Facebook Post dated Nov. 3, 2020	PLExpert00000087	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-309	May Use	R. Ceh Facebook Post dated Oct. 7, 2020	PLExpert00000132	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-310	May Use	Facebook Post dated Oct. 19, 2020	PLExpert00000235	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-311	May Use	News Article dated Nov. 1, 2020	PLExpert00000456	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues,

				misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-312	May Use	Facebook Post dated Oct. 26, 2020	PLExpert00000233	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-313	May Use	Facebook Post dated Sept. 13, 2020	PLExpert00000001	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-314	May Use	Facebook Post dated Oct. 14, 2020	PLExpert00000240	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-315	May Use	R. Ceh Facebook Post dated Oct. 27, 2020	PLExpert00000039	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-316	May Use	H. Ceh Facebook Post dated Oct. 30, 2020	PLExpert00000061	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-317	May Use	R. Ceh Facebook Post dated Oct. 17, 2020	PLExpert00000033	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-318	May Use	R. Ceh Facebook Post dated Oct. 17, 2020	PLExpert00000170	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-319	May Use	ACTT Facebook Admin Page	PLExpert00000392	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-320	May Use	El Conservador Facebook Page	PLExpert00000384	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-321	May Use	X Post (formerly Twitter) dated October 29, 2020	PLExpert00000379	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated
PTX-322	May Use	Video Footage dated Oct. 29, 2020	PLExpert00000403	FRE 901- not authenticated. No indication of where this was taken. Dolores Park was not present nor does she know anything of what is captured in the video. FRE 401- not relevance as it pertains to the allegations against Dolores Park. FRE 403, FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. contains inadmissible hearsay, FRE 801, 802. FRE 106- incomplete and misleading.
PTX-323	May Use	R. Ceh Facebook Post dated Oct. 30, 2020	PLExpert00000111	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of

				unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-324	May Use	R. Ceh Facebook Post dated Oct. 31, 2020	PLExpert00000065	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-325	May Use	Insider Article dated Nov. 2, 2020	PLExpert00000357	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-326	May Use	D. Park Video Footage dated Oct. 30, 2020	PLExpert00000377	FRE 106- objection to video being used in an incomplete manner, out of chronological order, in a manner that would be misleading or confusing to the jury, or out of context. Duplicative of PTX-73.
PTX-327	May Use	R. Ceh Facebook Comment dated Oct. 30, 2020	PLExpert00000179	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

PTX-328	May Use	R. Ceh Facebook Comment dated Oct. 30, 2020	PLExpert00000178	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-329	May Use	R. Ceh Facebook Comment dated Oct. 30, 2020	PLExpert00000177	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-330	May Use	J. Mesaros Facebook Comment dated Oct. 30, 2020	PLExpert00000398	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-331	May Use	J. Mesaros Facebook Comment dated Oct. 30, 2020	PLExpert00000297	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

PTX-332	May Use	Facebook Post dated Oct. 30, 2020	PLExpert00000079	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-333	May Use	Facebook Post dated Oct. 30, 2020	PLExpert00000184	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-334	May Use	J. Mesaros Facebook Post dated Oct. 30, 2020	PLExpert00000090	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-335	May Use	Twitter Post of J. Mesaros Facebook Comment dated July 1, 2021	PLExpert00000399	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

PTX-336	May Use	Text Messages Between J. Mesaros and R. Mesaros dated Feb. 11, 2021	PLExpert00000789	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-337	May Use	Facebook Post dated Oct. 31, 2020	PLExpert00000030	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-338	May Use	Facebook Post dated Oct. 31, 2020	PLExpert00000101	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-339	May Use	Facebook Post dated Oct. 31, 2020	PLExpert00000187	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

PTX-340	May Use	NBTT MeWe Page	PLExpert00000251	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-341	May Use	Facebook Post dated Nov. 1, 2020	PLExpert00000004	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-342	May Use	H. Ceh Facebook Post dated Oct. 31, 2020	PLExpert00000057	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-343	May Use	R. Mesaros Facebook Comment dated Feb. 20, 2021	PLExpert00000409	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

PTX-344	May Use	Facebook Post dated Nov. 1, 2020	PLExpert00000190	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-345	May Use	H. Ceh Facebook Post dated Oct. 31, 2020	PLExpert00000012	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-346	May Use	Facebook Post dated Nov. 1, 2020	PLExpert00000049	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-347	May Use	Facebook Post dated Nov. 3, 2020	PLExpert00000114	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

PTX-348	May Use	Screenrecording of the Schaflein Report dated Oct. 15, 2021	PLExpert00000396	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-349	May Use	Video Footage	PLExpert00000305	FRE 901, not authenticated. Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and this video should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-350	May Use	D. Park Video Footage dated Oct. 10, 2020	PLExpert00000419	FRE 106, incomplete and out of context, misleading.
PTX-351	May Use	Google Calendar Notification	PLExpert00000454	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-352	May Use	Screenshot of YouTube	PLExpert00000458	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and this video should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury,

				wasting time, needlessly presenting cumulative evidence.
PTX-353	May Use	Interview with E. Cisneros	PLExpert00000397	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-354	May Use	Facebook Post dated Oct. 20, 2020	PLExpert00000404	FRE 901, not authenticated. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Contains inadmissible hearsay, FRE 801, 802. Duplicative.
PTX-355	May Use	Screenrecording of D. Park Video Footage dated Oct. 30, 2020	PLExpert00000359	Duplicative of PTX-74. FRE 106, incomplete and misleading depending on context and sequence of presentation of evidence. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence
PTX-356	May Use	W. Davis Video Footage dated Oct. 30, 2020	PLExpert00000361	Duplicative of PTX-004. FRE 106- incomplete and out of context, no objection upon all of W. Davis's videos being admitted in order of time sequence and in context- otherwise too misleading and prejudicial under FRE 403
PTX-357	May Use	Screenrecording of Free Speech Defenders Fundraising Page	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-358	May Use	Instagram Post dated June 14, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-359	May Use	J. Mesaros Interview July, 9, 2022	Plaintiffs00006909	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-360	May Use	J. Mesaros Interview June 6, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-361	May Use	J. Mesaros Interview dated June 6, 2023	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-362	May Use	J. Mesaros Interview dated Oct. 8, 2021	Plaintiffs00003764	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-363	May Use	J. Mesaros Interview dated Nov. 22, 2001	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-364	May Use	J. Mesaros Interview dated Jan. 11, 2022	Plaintiffs00006354	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-365	May Use	Screenrecording of X Post (formerly Twitter) dated July 5, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-366	May Use	J. Mesaros Interview dated Feb. 12, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-367	May Use	J. Mesaros Interview dated Nov. 23, 2021	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-368	May Use	J. Mesaros Interview dated Feb. 26, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-369	May Use	J. Mesaros Interview dated May 29, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-370	May Use	J. Mesaros Interview dated Sept. 23, 2023	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-371	May Use	TikTok Video dated Oct. 10, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-372	May Use	TikTok Video dated Oct. 10, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-373	May Use	TikTok Video dated Aug. 8, 2022	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-374	May Use	X Post (formerly Twitter) dated June 1, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-375	May Use	X Post (formerly Twitter) dated June 2, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-376	May Use	X Post (formerly Twitter) dated June 3, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-377	May Use	X Post (formerly Twitter) dated Mar. 19, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-378	May Use	X Post (formerly Twitter) dated June 2, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-379	May Use	X Post (formerly Twitter) dated June 14, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-380	May Use	J. Mesaros Interview dated June 12, 2023	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-381	May Use	X Post (formerly Twitter) dated June 6, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence.
PTX-382	May Use	J. Mesaros Instagram Reel dated Apr. 8, 2024	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-383	May Use	<i>Cervini v. Stapp</i> Settlement Agreement entered into Oct. 2023	N/A	Contains inadmissible hearsay, FRE 801, 802. The settlement agreement in <i>Cervini v. Stapp</i> lacks all relevance as it pertains to Defendant Dolores Park, FRE 401. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Dolores Park has not knowledge of any actions of the San Marcos Police Department. These hearsay statements are inadmissible and unreliable as if pertains to Dolores Park who has never had any agreement or knowledge of the actions of the San Marcos Police Department. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-384	May Use	D. Gins Signal Messages dated Oct. 28, 2020	Plaintiffs 00000517; Plaintiffs 00000518; Plaintiffs 00000504; Plaintiffs 00000508; Plaintiffs 00000536;	Contains inadmissible hearsay, FRE 801, 802. FRE 106- incomplete and misleading. FRE, 601 statements made to which declarant lacks personal knowledge or competency testify or render opinions and conclusions. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

			Plaintiffs 0000052 3; Plaintiffs 0000053 2; Plaintiffs 0000054 1; Plaintiffs 0000055 1; Plaintiffs 0000054 6; Plaintiffs 0000054 5; Plaintiffs 0000054 4; Plaintiffs00000572; Plaintiffs00000567; Plaintiffs00000581; Plaintiffs00000590; Plaintiffs00000595; Plaintiffs00000577; Plaintiffs00000599; Plaintiffs00000603; Plaintiffs00000597; Plaintiffs00000623; Plaintiffs00000630;; Plaintiffs00000621; Plaintiffs00000639; Plaintiffs00000633; Plaintiffs00000646	
PTX-385	May Use	D. Gins Signal Messages dated Oct. 29, 2020	Plaintiffs00000635; Plaintiffs00000666; Plaintiffs00000655; Plaintiffs00000656 Plaintiffs00000665; Plaintiffs00000664; Plaintiffs00000652; Plaintiffs00000671; Plaintiffs00000670; Plaintiffs00000668; Plaintiffs00000681; Plaintiffs00000672; Plaintiffs00000679; Plaintiffs00000685; Plaintiffs00000699;	Contains inadmissible hearsay, FRE 801, 802. FRE 106- incomplete and misleading. FRE, 601 statements made to which declarant lacks personal knowledge or competency testify or render opinions and conclusions. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

			Plaintiffs00000687; Plaintiffs00000693; Plaintiffs00000718; Plaintiffs00000717; Plaintiffs00000715; Plaintiffs00000729; Plaintiffs00000738; Plaintiffs00000737; Plaintiffs00000724; Plaintiffs00000730; Plaintiffs00000752; Plaintiffs00000754; Plaintiffs00000745; Plaintiffs00000741; Plaintiffs00000762; Plaintiffs00000765; Plaintiffs00000778;	
PTX-386	May Use	H. Ceh Declaration dated Apr. 26, 2023	N/A	Contains inadmissible hearsay, FRE 801, 802. This declaration is an out-of-court statement offered for the truth of the matter asserted. Dolores Park does not know Hannah Ceh and never entered into a conspiracy with her. Dolores Park has never communicated with Hannah Ceh at all. This declaration is inadmissible and unreliable as it pertains to Dolores Park. FRE 901, not authenticated- the declaration does not read like the writing of Hannah Ceh that is known and part of the record in this case. This declaration appears to simply be written by Plaintiffs' counsel. FRE 106- incomplete and misleading, This declaration appears to be the result of the writings of Plaintiffs' counsel in attachment to an agreement for Hannah Ceh to enter into a settlement agreement and have the case dismissed against her. Defendants have not been privy to the terms of the settlement agreement and should have been to inquire into the motives and reasons for Hannah Ceh in this declaration. FRE 401, this declaration is irrelevant to Dolores Park and does not describe her actions nor her motives. FRE- 602, lack of personal knowledge. Hannah Ceh has no basis of knowledge to opine or make any statements regarding Dolores Park as she does not know her and has never communicated with her. Hannah Ceh

				cannot speak for Dolores Park. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Fed. R. Civ. P. 37, this declaration was never produced to Dolores Park during discovery and therefore cannot be used as evidence in this case.
PTX-387	May Use	K. Kruger Declaration dated Apr. 26, 2023	N/A	Contains inadmissible hearsay, FRE 801, 802. This declaration is an out-of-court statement offered for the truth of the matter asserted. Dolores Park does not know Kyle Kruger and never entered into a conspiracy with her. Dolores Park has never communicated with Kyle Kruger at all. This declaration is inadmissible and unreliable as it pertains to Dolores Park. FRE 901, not authenticated- the declaration does not read like the writing of Kyle Kruger that is known and part of the record in this case. This declaration appears to simply be written by Plaintiffs' counsel. FRE 106- incomplete and misleading, This declaration appears to be the result of the writings of Plaintiffs' counsel in attachment to an agreement for Kyle Kruger to enter into a settlement agreement and have the case dismissed against her. Defendants have not been privy to the terms of the settlement agreement and should have been to inquire into the motives and reasons for Kyle Kruger in this declaration. FRE 401, this declaration is irrelevant to Kyle Kruger and does not describe her actions nor her motives. FRE- 602, lack of personal knowledge. Kyle Kruger has no basis of knowledge to opine or make any statements regarding Dolores Park as she does not know her and has never communicated with him. Kyle Kruger cannot speak for Dolores Park. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. Fed. R. Civ. P. 37, this declaration was never produced to

				Dolores Park during discovery and therefore cannot be used as evidence in this case.
PTX-388	May Use	NBPD 911 Call Recording dated Oct. 30, 2020	NONPARTY_0000 1993	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-389	May Use	NBPD 911 Call Recording dated Oct. 30, 2020	NONPARTY_0000 1994	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-390	May Use	NBPD 911 Call Recording dated Oct. 30, 2020	NONPARTY_0000 1993	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-391	May Use	NBPD 911 Call Recording dated Oct. 30, 2020	NONPARTY_0000 1994	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-392	May Use	NBPD 911 Call Recording dated Oct. 30, 2020	NONPARTY_0000 1993	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-393	May Use	E. Cisneros Text Message dated Nov. 2, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-394	May Use	Video Footage from I-35 dated Oct. 30, 2020	N/A	Duplicative of PTX-26. Video contains inadmissible hearsay, FRE 801, 802. FRE 106- incomplete and out of context, misleading, unfairly prejudicial. FRE 403. Lacks authentication FRE 901. Video appears 100% duplicative of PTX-008.
PTX-395	May Use	Photograph Photograph from I-35 dated Oct. 30, 2020	N/A	Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete or misleading. Photograph taken from misleading perspective.
PTX-396	May Use	NBTT Facebook Group Membership List	N/A	No objection.
PTX-397	May Use	Facebook Post dated Aug. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance

				substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-398	May Use	C. Ceh Text Message dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-399	May Use	C. Ceh Text Message dated Oct. 30, 2020 to Oct. 31, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-400	May Use	Text Message Between Members of Ceh Family dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-401	May Use	Video Footage from I-35 dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401.

PTX-402	May Use	H. Ceh Instagram Story dated Oct. 31, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-403	May Use	H. Ceh Text Messages dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-404	May Use	Video Footage from I-35 dated Oct. 30, 2020	N/A	Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401.
PTX-405	May Use	H. Ceh's Responses to Plaintiffs' First Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-406	May Use	H. Ceh's Responses to Plaintiffs' First Set of Requests for Production	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of

				unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-407	May Use	H. Ceh's Responses to Plaintiffs' First Set of Requests for Admissions	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-408	May Use	H. Ceh's Responses to Plaintiffs' First and Second Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-409	May Use	H. Ceh's Responses to Plaintiffs' First and Second Set of Requests for Production of Documents	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-410	May Use	H. Ceh's Response to Plaintiffs' Third Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues,

				misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-411	May Use	H. Ceh's Responses to Plaintiffs' Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-412	May Use	J. Peña Ahuyon Deposition Transcript	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with J. Peña Ahuyon and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-413	May Use	J. Peña Ahuyon Video of Deposition	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with J. Peña Ahuyon and his statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-414	May Use	J. Peña Ahuyon Subpoena	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-415	May Use	Facebook Post dated May 11, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-416	May Use	Facebook Post dated May 18, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-417	May Use	Facebook Post dated May 17, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-418	May Use	E. Cisneros' Responses to Plaintiffs' First Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-419	May Use	Plaintiffs' Second Set of Interrogatories to H. Ceh	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-420	May Use	H. Ceh's Responses to Plaintiffs' Second Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-421	May Use	R. Ceh Facebook post dated Sept. 26, 2020	NONPARTY_ALLI SON00012177	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-422	May Use	J. Mesaros' Responses to Plaintiffs' First Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-423	May Use	R. Mesaros' Responses to Plaintiffs' First Set of Interrogatories	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-424	May Use	J. Peña Ahuyon Facebook Friends	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-425	May Use	J. Peña Ahuyon Facebook Friends	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-426	May Use	J. Peña Ahuyon Facebook Friends	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time,

				needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-427	May Use	J. Peña Ahuyon Facebook Friends	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-428	May Use	NBTT Facebook Group Membership List	NONPARTY_ALLI SON00017004	No objection.
PTX-429	May Use	Facebook Post dated Sept. 15, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-430	May Use	ACTT Facebook Group Membership List	NONPARTY_ALLI SON00016720	No objection.
PTX-431	May Use	News Article dated Nov. 2, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-432	May Use	News Article dated Oct. 28, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as

				evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-433	May Use	NBTT MeWe Page	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-434	May Use	Facebook Post dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with any one and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-435	May Use	Video Footage from I-35 dated Oct. 30, 2020	N/A	FRE 106- incomplete, short video clip
PTX-436	May Use	Video Footage from I-35 dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.

PTX-437	May Use	J. Peña Ahuyon Text Messages dated Aug. 20, 2021	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-438	May Use	S. Hill Deposition Transcript	N/A	No objection.
PTX-439	May Use	S. Hill Video of Deposition	N/A	No objection.
PTX-440	May Use	S. Hill Facebook Messages dated July 2021	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated.
PTX-441	May Use	S. Hill Subpoena	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated
PTX-442	May Use	Facebook Post dated June 25, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park,

				FRE 401. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated
PTX-443	May Use	J. Mesaros Facebook Comments	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated
PTX-444	May Use	ACTT Facebook Group Membership List	N/A	No objection.
PTX-445	May Use	Spreadsheet Contact Information	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.
PTX-446	May Use	Facebook Post dated Apr. 10, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence.

PTX-447	May Use	News Article dated Oct. 30, 2020	N/A	Contains inadmissible hearsay, FRE 801, 802. Dolores Park never entered into a conspiracy with anyone and these statements should not be used as evidence against her. Lacks relevance as it pertains to Defendant Dolores Park, FRE 401. FRE 106, incomplete and misleading. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 901- not authenticated
PTX-448	May Use	D. Park's Amended Responses to Plaintiffs' First Set of Interrogatories	N/A	Duplicative of PTX-228. Contains inadmissible hearsay, FRE 801 and 802. FRE 403, relevance substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, needlessly presenting cumulative evidence. FRE 106, incomplete and misleading. Dolores Park also reasserted the objections stated in her amended response to Plaintiffs' first set of interrogatories.-

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all registered ECF participants listed for this case. I sent via email per agreement of the parties a copy of the foregoing to Defendants Steve Ceh and Randi Ceh at the following addresses provided by the parties:

Steve Ceh
Email: steveceh33@gmail.com

Randi Ceh
Email: randiceh716@gmail.com

/s/ Erin Elizabeth Mersino
Erin Elizabeth Mersino